

FILED

MAR 15 2017


CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

UNITED STATES OF AMERICA,

CR *17-10013*

Plaintiff,

REDACTED INDICTMENT

v.

RECEIPT OF IMAGES DEPICTING
THE SEXUAL EXPLOITATION OF
MINORS and POSSESSION OF
CHILD PORNOGRAPHY

CHAVEZ SPOTTED HORSE,

Defendant

18 U.S.C. §§ 2252(a)(2), 2252(b)(1),
2256(2)(A), 2252A(a)(5)(B),
2252A(b)(2), and 2256(8)

The Grand Jury charges:

COUNT I

On or about between the 1st day of January, 2013, and the 3rd day of November, 2015, in the District of South Dakota, and elsewhere, Chavez Spotted Horse did knowingly receive any visual depiction using a means and facility of interstate and foreign commerce, to-wit, the internet, which depiction had been transported in interstate and foreign commerce by any means, including by computer, and the visual depiction involved the use of a minor engaging in sexually explicit conduct and which depiction was of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2), 2252(b)(1), and 2256(2)(A).

COUNT II

On or about between the 1st day of January, 2013, and the 3rd day of November, 2015, in the District of South Dakota, and elsewhere, Chavez Spotted Horse did knowingly possess and knowingly access with intent to view computer

files that contained an image of child pornography that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, and were produced using material that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2), and 2256(8).

A TRUE BILL:

NAME REDACTED

Foreperson

RANDOLPH J. SEILER
United States Attorney

By

A handwritten signature in blue ink, appearing to be "J. Seiler", written over a horizontal line.